

EXHIBIT “1”

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Attorneys for Defendant, INTERNATIONAL PAPER COMPANY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT

TRAVONNE BORDERS, an individual,
 Plaintiff,

v.

INTERNATIONAL PAPER COMPANY,
 a New York corporation; ANGIE DOE, an
 individual; and DOES 1 through 20,
 inclusive,
 Defendants.

CASE NO. 22STCV15935
[Unlimited Jurisdiction]

*Assigned for all purposes to the
 Honorable Jon R. Takasugi, Dept. 17*

**DEFENDANT INTERNATIONAL PAPER
 COMPANY'S NOTICE TO ADVERSE
 PARTY OF REMOVAL OF ACTION TO
 FEDERAL COURT**

Complaint: 5-12-2022
 Trial Date: [not set]

TO PLAINTIFF TRAVONNE BORDERS AND HIS COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, on June 17, 2022, Defendant International Paper Company ("Defendant"), through undersigned counsel, filed a Notice of Removal pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 in the above-captioned action, removing the above-captioned action to the United States District Court for the Central District of California. A true and correct copy of the Notice is attached hereto as **Exhibit 1** (without re-attaching this document as part of the exhibit).

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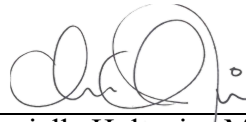
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1 Pursuant to 28 U.S.C section 1446(d), the filing of the aforesaid Petition for Removal in
2 the District Court, together with the filing of this Notice with this Court and notice to all adverse
3 parties, effects the removal of this action, and this Court may not proceed further with the above-
4 captioned litigation unless and until the case is remanded.

5
6 DATE: June 15, 2022

FISHER & PHILLIPS LLP

7
8 By:


Danielle Hultenius Moore
Aaron F. Olsen
Christopher M. Champine
Attorneys for Defendant
INTERNATIONAL PAPER COMPANY

PROOF OF SERVICE
(CCP §§1013(a) and 2015.5)

I, the undersigned, am at least 18 years old and not a party to this action. I am employed in the County of San Diego with the law offices of Fisher & Phillips LLP and its business address is 4747 Executive Drive, Suite 1000, San Diego, California 92121.

On the below date, I served the following document(s) **DEFENDANT INTERNATIONAL PAPER COMPANY'S NOTICE TO ADVERSE PARTY OF REMOVAL OF ACTION TO FEDERAL COURT** on the person(s) listed below with ☐ the original ☒ a true copy thereof enclosed addressed as follows:

Samvel Setyan (SBN 325831)
 SETYAN LAW, APC
 750 E. Green Street, Suite 310
 Pasadena, California 91101

Attorney for Plaintiff, Travonne Borders

T: 213-618-3655
 E: s.setyan@setyanlaw.com

- ☐ **[by ELECTRONIC SERVICE]** - Based on a court order or an agreement of the parties to accept service by electronic transmission, I electronically served the document(s) to the person(s) at the electronic service address(es) listed above.
- ☐ **[by MAIL]** - I enclosed the document(s) in a sealed envelope or package addressed to the person(s) whose address(es) are listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in San Diego California, in a sealed envelope with postage fully prepaid.
- ☒ **[by FEDERAL EXPRESS]** - I am readily familiar with the firm's practice for collection and processing of correspondence for overnight delivery by Federal Express. Under that practice such correspondence will be deposited at a facility or pick-up box regularly maintained by Federal Express for receipt on the same day in the ordinary course of business with delivery fees paid or provided for in accordance with ordinary business practices.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed June 15, 2022, at San Diego, California.

Susan Jackson

Print Name

By: 

Signature